

REMARKS/ARGUMENTSClaim Amendments

Independent claims 1 and 8, and dependent claim 5, have been amended and dependent claims 7 and 14 have been cancelled. Accordingly, claims 1, 4-6, 8, 11-13 and 15-16 currently stand pending in this application. No new matter has been added by these amendments.

Applicants respectfully request reconsideration and withdrawal of the claim rejections by the Examiner having regard to the following submissions.

35 U.S.C. §102 Rejection

The Examiner rejected claims 1, 4-5, 8, 11-12 and 15-16 under 35 U.S.C. §102(b) as being allegedly anticipated by **Millier et al** (U.S. Patent No. 5,899,995). Claims 7 and 14 were not rejected on this ground.

Applicants have added to the independent claims 1 and 8, *inter alia*, the features of said dependent claims 7 and 14, now cancelled, which were not rejected on this ground. Accordingly, the present amendments to the independent claims 1 and 8 are believed to overcome this ground of rejection and withdrawal of the same is respectfully requested.

35 U.S.C. §103 Rejection

The Examiner rejected claims 6-7 and 13-14 under 35 U.S.C. 103(a) as allegedly being unpatentable over **Millier et al** and further in view of **Hyatt** (U.S. patent No. 6,678,692). In response, applicants traverse such allegation and submit as follows.

As stated, dependent claims 7 and 14 have been cancelled and, *inter alia*, those features have been added to independent claims 1 and 8, respectively. Referring to amended claim 1, this claim now recites "a knowledge base comprising a plurality of concepts, themes, sub-concepts and/or sub-themes" and "a concept learner component configured for automatically learning dynamic information

pertaining to said user on the basis of prior action(s) of said user automatically sensed by an environment sensor, for input to the knowledge base". In addition, the claim recites a "the prioritization analyser component configured for dynamic ordering of said recognized concepts, themes, sub-concept and/or sub-themes, with said documents associated therewith, according to priorities of said user determined from said preferences information, wherein said preferences information includes said learned dynamic information". Claim 5 has been amended in a self-explanatory manner to correct the original wording.

Accordingly, the subject matter defined by the independent claims includes a learner component 130, which applies learned information to update a knowledge base 125, including automatically learned knowledge pertaining to the user on the basis of prior action(s) of the user automatically sensed by an environment sensor. Thus, the knowledge base of the claimed system comprises dynamic (i.e. changing over time) learned knowledge about the user and that dynamic learned user information is also used to prioritize the documents for purposes of presentation on an electronic display. Therefore, the particular results of the concept recognition and document prioritization/presentation of the claimed system may change from one time to another; and, for a given set of input documents, whose content is static (not changing over time), the system may differently recognize those same documents, differently order (prioritized) them and differently present them on an electronic display, over time, as the system's knowledge of the user changes. In other words, the resulting display presentation is dynamic: even though it is produced from the same set of static input documents, the presentation may differ from one time to another depending on what is automatically sensed by environmental sensors.

Neither **Millier** nor **Hyatt**, whether considered alone, in combination or in view of other prior art, disclose applicants' claimed dynamic (i.e. changing with time) learning on the basis of automatically sensed environmental information. Nor do they contemplate such a dynamic recognition of concepts associated with a given set of documents or such dynamic prioritization, ordering and presentation of those documents which, themselves, remain the same as they were when they were input to the system but for which the handling, by the system, changes with time because new contexts are defined by automatically sensed environmental information.

Contrary to the Examiner's allegation that **Millier** "teaches a concept learner component that creates said dynamic information pertaining to the user based on data sensed from the system's environment for input to a knowledge base of user data (Column 3, lines 18 et seq.)", **Millier**, in fact, contains only the following oblique, isolated suggestion of a "learning profile" based on user's actions in organizing the desktop. However, no part of the electronic filing system described by **Millier** does this and nothing is provided in **Millier** as to how, or using what components, this could be done. **Millier's** referenced statements constitute merely an empty suggestion for a bare result realizable by different means, and not pointing to applicants' system of claims 1 and 8 herein:

The SmartFolder Intelligent Filing System (IFS) allows the user to deline a set of rules that allow the document to be filed in multiple contexts of the user's choosing. This automatic filing process is less susceptible to lapses of human memory, and the rules can be defined in terms of "learning" profiles that automatically adjust as the user organizes the desktop. The documents are categorized by their contents. Therefore, the tedious process of searching based on contents is eliminated.

The SmartFolder IFS is document-oriented rather than application-oriented. The filing of the documents is independent of the application (e.g., Eudora, CCMail, USENET news readers) that is supplying the document. The SmartFolder IFS allows the user to set up a rule based on a learning "profile" which captures the history of usage of the user over time. The profile can adjust according to user's actions to become better and better at categorizing the user's documents, even if the user cannot state exactly what the rules are for the categorization. In other words, the SmartFolder IFS "learns" the rules based on how the user arranges the information.

Millier does not contemplate a dynamic presentation such as is provided by applicants' system and no presentation feature for input documents is even contemplated by **Millier**. As stated in previous submissions with respect to **Hyatt**, only a static system ranking of documents is disclosed by **Hyatt**, without dynamic

characterization in any respect.

It is submitted that no manner of combination of the cited references may, reasonably, be considered to render obvious applicants' claimed invention. Withdrawal of this objection, and allowance of the amended claims, is requested.

Respectfully Submitted,
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